

FOCUSED SITE INSPECTION PRIORITIZATION SITE EVALUATION REPORT

SWIFT AG CHEMICAL FAIRMONT CITY PLANT 2501 NORTH KINGS HIGHWAY EAST ST. LOUIS, ILLINOIS

CERCLIS ID NO.: ILD059995423

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY

Site Assessment Section 77 West Jackson Boulevard Chicago, IL 60604

Date Prepared: September 28, 1995

U.S. EPA Region: 5

Contract No.: 68-W0-0037

Technical Direction Document: T05-9503-237

Prepared by: Alix Rauschman

E & E Program Leader: Steven Skare

Telephone No.: (312) 663-9415



ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415 International Specialists in the Environment

recycled paper

TABLE OF CONTENTS

Section		<u>Page</u>
·1	INTRODUCTION	1-1
2	SITE DESCRIPTION AND HISTORY	2-1
3	PREVIOUS INVESTIGATIONS	3-1
4.	MIGRATION AND EXPOSURE PATHWAYS 4.1 GROUNDWATER MIGRATION PATHWAY 4.1.1 Geology and Soils 4.1.2 Groundwater Releases 4.1.3 Targets 4.2 SURFACE WATER MIGRATION PATHWAY 4.3 SOIL EXPOSURE PATHWAY 4.4 AIR MIGRATION PATHWAY	4-1 4-1 4-1 4-2 4-2 4-3 4-3 4-4
5	SUMMARY	5-1
6	REFERENCES	6-1
Appendix		<u>Page</u>
. A	1995 SITE RECONNAISSANCE PHOTOGRAPHS	A-1
В	1990 SCREENING SITE INVESTIGATION SOIL SAMPLING LOCATIONS AND ANALYTICAL RESULTS	B-1
С	ENDANGERED SPECIES LIST FOR ST. CLAIR COUNTY	C-1
D .	REFERENCE DOCUMENTATION	D-1

LIST OF FIGURES

Figure		Page
2-1	Site Location Map	2-5
2-2	Site Features Map	2-6

1. INTRODUCTION

The Ecology and Environment, Inc. (E & E), Technical Assistance Team (TAT) was assigned by the United States Environmental Protection Agency (U.S. EPA), under Contract No. 68-W0-0037, Technical Direction Document (TDD) T05-9503-237, to evaluate the Swift Ag Chemical Fairmont City Plant (Swift Ag) site located in East St. Louis, St. Clair County, Illinois. E & E performed Focused Site Inspection Prioritization (FSIP) activities for the site to determine to what extent they pose a threat to human health and the environment. This FSIP report presents the results of E & E's evaluation and summarizes site conditions and targets pertinent to the migration and exposure pathways associated with the site background. Background information was obtained from E & E's 1990 Screening Site Inspection (SSI) report, an Illinois Environmental Protection Agency (IEPA) 1989 Screening Inspection report, E & E site photographs taken on April 13, 1995, and an E & E site reconnaissance performed on July 19, 1995.

This report is organized into six sections, including this introduction. Section 2 describes the site and provides a brief site history. Section 3 provides information about previous investigations conducted at the site. Section 4 provides information about the four migration and exposure pathways (groundwater migration, surface water migration, soil exposure, and air migration). Section 5 is a report summary. References used in the preparation of this report are listed in Section 6.

2. SITE DESCRIPTION AND HISTORY

The Swift Ag site is located at 2501 North Kings Highway, East St. Louis, St. Clair County, Illinois (SE1/4 sec. 4, T. 2 N., R. 9 W.). The coordinates of the site are latitude 38°52'58" North and longitude 90°10'20" West (IEPA 1989). It is currently an active chemical processing facility which located southwest of Fairmont City, Illinois, on the northeastern edge of the City of East St. Louis, Illinois. The site is bordered on the south by Rose Creek and the Penn Central railroad tracks. A residential area is located south of the site across the railroad tracks. A vacant lot borders the site to the north and west (see Appendix A, photographs 1 and 2). The site is bordered to the east by Kings Highway, directly across from the Allied Chemical Corporation East St. Louis Works chemical manufacturing facility (see Appendix A, photograph 3). The City of East St. Louis has a population of 55,200, and Fairmont City has a population of 2,139 (U.S. Bureau of the Census 1992). The area surrounding the site is industrial and urban (See Figure 2-1).

The site is situated on about 10 acres of land, consisting of seven buildings and fifteen chemical and oil storage tanks scattered throughout the property. The site's features are shown in Figure 2-2. Rose Creek is the closest surface water body, located adjacent to the south side of the site. However, it is an intermittent stream that flows west approximately 2.2 miles west and appears to drain into Old Cahokia Creek, the closest perennial surface water body (United States Geological Survey 1974). The topography of the site slightly slopes to the south (IEPA 1989). Regional groundwater flow direction under the site is west/southwest, towards the Mississippi River (E & E 1990).

E & E's Field Investigation Team (FIT) performed a site reconnaissance and sampling of the Swift Ag site on August 2, 1989. E & E TAT performed a site

reconnaissance of the Swift Ag site on July 19, 1995. The following is a description of the Swift Ag site based on these site visits. The site is completely fenced, with two gates to allow access to the site. One gate is at the main entrance to the site off of Kings Highway, and the second gate is west of the railroad spurs in the southwest corner of the site. This gate appears to be used only for railcar entry and exit from the site (E & E 1990).

An old office building, currently vacant, is located south of the main entrance. A new office building is located west of the entrance, northwest of the old office building. Two small employee buildings are located just south of the new office building (E & E 1990).

The majority of the site area is covered by Building #1, which houses most of the plant operations such as blending and packaging. Building #1, located south of the office and employee buildings, is constructed of concrete and wood and appeared to be in very poor condition at the time of the E & E FIT SSI (E & E 1990). At the time of E & E's 1995 site reconnaissance, Building #1 was still being used for blending and packaging solid fertilizers which contained mono- and di-ammonium phosphates (see Appendix A, photos 6-7). Leftover fertilizers are blown into piles, then swept up and sold for resale to local farmers (Kenna 1995). A hopper loading dock, located near the northeast corner of Building #1, was where discolored soils were observed during the 1989 SSI.

Building #1A is located north and adjacent to Building #1. An empty oil tank and a 10,000-gallon fuel oil tank (Nos. 1 and 2 in Figure 2-2) are located just north of Building #1A. A 30,000-gallon anhydrous ammonia tank and a 12,000-gallon sulfuric acid tank (Nos. 3 and 4), both empty during the time of the SSI, are located at the northwest corner of the Building #1A, and a water tank (No. 5) is located to the west (E & E 1990).

Seven tanks are located at the northwest corner of Building #1 (see Appendix A, photograph 4). Three of the tanks, Nos. 9, 10, and 11, are empty silos which contained unknown prior contents. The other four tanks, Nos. 12, 13, 14, and 15, are surrounded by an earthen berm approximately three feet high. Tank #12 was empty at the time of the SSI and its prior use was unknown. Tanks #13 and #14 were once used to hold phosphoric acid, but were also empty at the time of the SSI. Tank #15, a 12,000-gallon tank, is used for storage of dust-suppressant oil. A small maintenance shed is also located northwest of Building #1 (E & E 1990; E & E 1995a).

Approximately 100 feet north of Building #1, there are six 100,000 gallon concrete tanks for solid fertilizers, and numerous liquid ammonia and fertilizer tanks (see Appendix A,

photographs 8 and 9). Mr. Kenna reported that all of the tanks were empty. This was confirmed during the 1995 site reconnaissance (E & E 1995a).

And the second s

Approximately 50 feet west of Building #1, there is an area which formerly contained 45,000-gallon underground storage tank (UST). The tank, along with surrounding contaminated soil, was removed in accordance with IEPA and State Fire Marshall regulations. In this same general area there remains two 700-gallon aboveground tanks. The grinding plant located north of the remaining tanks, contains a grinder and a flame-operated dryer. The furnace portion of the dryer contains asbestos. The grinding building is not secured, however, a warning sign is posted in front of the building guarding against asbestos exposure is present. According to Mr. Kenna, Swift Ag is in the process of selecting a contractor for asbestos removal at the site (E & E 1995a).

A former settling basin is located in the northwest corner of the site. When use of the settling basin was discontinued, material from this area was excavated and deposited into the old reservoir, located to the west of Building #1. The settling basin area was then covered with cinders. E & E FIT observed an area of discolored soil near the location of the former settling basin (E & E 1990).

A propane tank (No. 6) and several railroad spurs are located adjacent to western side of Building #1. Two other propane tanks (Nos. 7 and 8) are located at the southeast corner of Building #1 (E & E 1990).

An old pumphouse, which contains a non-functioning well, is located west of the railroad spurs on the western side of Building #1. An abandoned 1,000-gallon reservoir which was previously used to store excavated material from the settling basin is located adjacent to the western side of the old pumphouse. The reservoir had a concrete floor and an open top and was partially filled with fertilizer slurry waste at the time of the SSI. Fill material had been bulldozed over the edge of the reservoir, and portions of the filled-in reservoir are vegetated (E & E 1990).

Several ditches were observed on site during the 1989 SSI. A ditch containing greenish-tinted standing water was observed adjacent to Building #1. This ditch runs from east to west along the north side of Building #1, between the tanks and the building, and then passes through a culvert before exiting the property near the northwest corner of the site. A second ditch was observed at the southeast corner of the site. This ditch, which also contained greenish-tinted standing water, runs a short distance north to south and then flows

into Rose Creek. Rose Creek flows adjacent to the site's southern boundary between the site and the Penn Central railroad tracks (E & E 1990).

A third drainage ditch was observed adjacent to the site on its north and west sides. The on-site ditch that exits the site at the northwest corner joins with this off-site ditch as it flows along the west side of the site. This ditch also contained greenish-tinted water. Rose Creek passes through a concrete culvert and then joins with this ditch at the southwest corner of the site. These ditches, as well as Rose Creek, all appear to be manmade drainage ditches. Additional culverts were observed at several locations on the west and south perimeters of the site. These culverts consisted of pipes that passed underneath the site fence (E & E 1990).

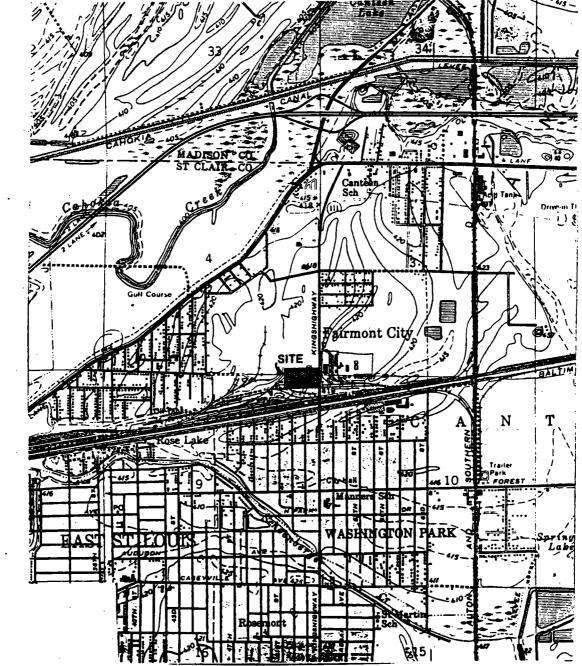
The Swift Ag site is an active chemical processing facility. It has been in existence since 1931. The original owner of the site was Virginia Carolina Chemical Company. Subsequent owners have included Mobil Chemical (1967 to 1971), Swift and Company (1971 to 1983), and Beatrice, Inc. (1983 to 1986). The current owner of the facility is Vigoro Industries (Britt 1989).

The site has always been operated as a fertilizer production facility. Currently, only dry-mix blending occurs. In the past, the facility utilized both solid and liquid raw materials in a granulation process for fertilizer formation. Raw materials currently utilized at the site include potash, anhydrous ammonia, sulfuric acid, and phosphoric acid. Raw materials are brought in by truck or railroad and are dry-mixed and blended on site prior to packaging and shipping of the fertilizers off site. A on-site wet scrubber is used to control fine-particle air emissions.

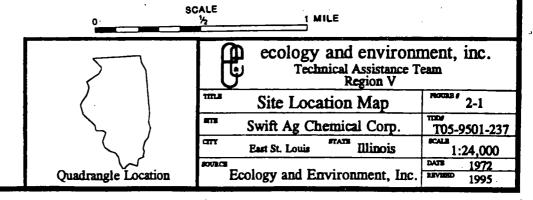
Previous waste disposal practices at the site have included the use of a reservoir and a settling basin for the deposition of slurry from the wet scrubber. The 1,000-gallon capacity reservoir was constructed of concrete, but was open to the atmosphere. Eventually, the reservoir was filled and its use was discontinued (Britt 1989).

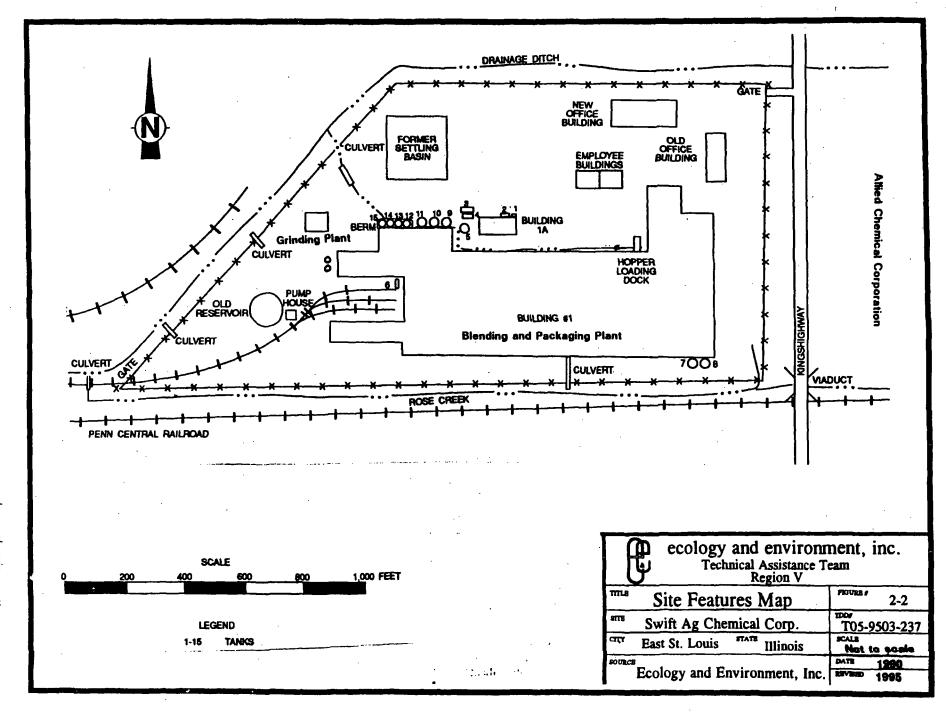
The Swift Ag Chemical site has been occupied since 1931. The facility does not have Resource Conservation and Recovery Act (RCRA) or National Pollution Discharge Elimination System (NPDES) permits. However, operations at the facility were permitted under an IEPA operating permit (#72100690), issued on July 17, 1989. This permit expired on July 17, 1991. No further information pertaining to this permit was available in site files. No enforcement actions were known to have occurred or are currently pending concerning the Swift Ag site.





SOURCE: Ecology and Environment, Inc. 1990; BASE MAP: USGS, Monks Mound, IL Quadrangle, 7.5 Minute Series, 1954, photorevised 1974.





3. PREVIOUS INVESTIGATIONS

The Swift Ag Chemical site was initially discovered through several complaints received by IEPA concerning waste spills. On August 21, 1973, the U.S. Coast Guard reported to IEPA that an unknown quantity of white material had been discharged from the Swift Ag site to Rose Creek. The discharge occurred when a sulfuric acid tank was being emptied and cleaned to repair a leak (Merz 1973). It was estimated that between 2,000 and 3,000 gallons of sulfuric acid and water were discharged to Rose Creek as a result of the spill (Britt 1989).

IEPA's Division of Water Pollution Control responded by inspecting the Swift Ag site immediately. The investigation revealed that a discharge was not occurring at the time of the site visit. It was apparent, however, that a large volume of this milky white substance had recently been discharged. The analytical results revealed that the liquid was highly acidic and contained excessive concentrations of numerous contaminants (Coyne 1983). Monitoring of the site was to be continued, but no enforcement action or cleanup was required.

On March 7, 1975, an IEPA biologist working in the area of the Swift Ag site observed that water in a drainage ditch adjacent to the site's norther border was green. A conversation between IEPA representatives and the Swift and Company Plant Manger revealed that the green color was caused by a dye used to color fertilizer. The Plant Manager indicated that surface water runoff from the plant area into the drainage ditch occasionally caused the green color in the water. No enforcement action or cleanup of the site was required (Merz 1975).

The site was initially identified to U.S. EPA when it was included on the Waste Disposal Site Survey presented in October 1979 to the Subcommittee on Oversight and

Investigation of the Committee on Interstate and Foreign Commerce, 96th Congress. The site was included in the Illinois portion of this survey.

In 1985, a spill of approximately 1,000 gallons of oil allegedly occurred when a tank valve was mistakenly opened and oil leaked into Rose Creek. The spill was apparently cleaned up, and the cleanup was inspected by IEPA representatives. No further information regarding impacted soils or the amount of soil removed during the cleanup was documented in the site file (Britt 1989). The site was then evaluated in the form of a PA that was submitted to U.S. EPA. The PA was prepared by IEPA April 4, 1986.

On August 2, 1989, E & E FIT conducted an SSI at the Swift Ag site. Twelve soil/sediment samples were collected. Soil sample S1 was a composite surface sample collected from two areas of stained soil located near the hopper loading dock adjacent to Building #1. Surface soil sample S2 was collected from the area between Building #1 and tank 15 (dust suppressant oil). Sediment sample S3 was collected from the ditch that runs from the north side of Building #1 to the northwest side of the site, just prior to its confluence with the off-site ditch located on the west side of the site. Soil sample S4 was collected from within the old reservoir. Surface soil sample S5 was collected from discolored soil in the area of the former settling basin. Sediment sample S6 was collected from within a culvert located at the southwest end of the site. Sediment sample S7 was collected from the same ditch as where sediment sample S3 was collected just prior to its confluence with Rose Creek. Sediment sample S8 was collected just after the ditch confluence with Rose Creek. Sediment sample S9 was collected from the ditch located at the southeast corner of the site, just prior to its confluence with Rose Creek. Sediment sample S10 was collected from Rose Creek just prior to reach the site at its southeast corner. Sediment sample S11 was collected from the same ditch as samples S3, S7 and S8 just prior to its reaching the northeast corner of the site. Potential background sample S12 was collected from beneath a tree in front of the old office building at the northeast corner of the site (E & E 1990). All sediment/surface water samples contained volatile organic compounds (VOCs), base-neutral acids (BNAs), pesticides, and inorganics. Contaminants of concern are as follows: methylene chloride was encountered in the background sample at 14 micrograms per kilogram (µg/kg). No samples contained methylene chloride at concentrations greater than three times the background sample. Sample S3 contained benzene at 4 μ g/kg. All samples contained polynuclear aromatic hydrocarbons (PAHs), phthalates, and phenols. Background sample S12 contained naphthalene at 40 μ g/kg,

4-chloro-3-methylphenol at 45 μ g/kg, phenanthrene at 51 μ g/kg, fluoranthene at 50 μ g/kg, pyrene at 55 μ g/kg, chrysene at 45 μ g/kg, and benzo(b)fluoranthene at 66 μ g/kg. All samples that contained these contaminants contained them at concentrations greater then three times the background concentration. The background sample did not contain any pesticides. Sample S6 contained dieldrin at 4,000 micrograms per kilogram (μ g/kg), and samples S1 and S6 contained gamma chlordane at 230 μ g/kg and 350 μ g/kg, respectively. Sediment samples S3 and S7 contained gamma chlordane at 1,700 μ g/kg and 430 μ g/kg, respectively. These samples also contained dieldrin at 290 μ g/kg and 340 μ g/kg, respectively. The presence of these chemicals can be attributed to the use of these pesticides (E & E 1990).

Background sample S12 contained the following inorganics of concern: arsenic at 3.4 milligrams per kilogram (mg/kg), beryllium at 116 mg/kg, chromium at 15.3 mg/kg, and iron at 17,400 mg/kg. Samples S1, S6, S7, S8, S9, and S10 contained arsenic at concentrations greater than three times the background concentration. Samples S3, S4, S6, and S10 contained beryllium at concentrations greater than three times the background concentration. Samples S4, S6, S7, S8, S10, and S11 contained chromium at concentrations greater than three times the background concentration. No samples contained iron at concentrations greater than three times the background concentration. Mercury was encountered in all samples, but S4. A sample location diagram and analytical data are included in Appendix B of this report.

4. MIGRATION AND EXPOSURE PATHWAYS

This section describes the four migration and exposure pathways associated with the Swift Ag site. Section 4.1 discusses the groundwater migration pathway; Section 4.2 discusses the surface water migration pathway; Section 4.3 discusses the soil exposure pathway; and Section 4.4 discusses the air migration pathway.

4.1 GROUNDWATER MIGRATION PATHWAY

This section discusses regional geology and soils, groundwater releases, and targets associated with the groundwater migration pathway at the site.

4.1.1 Geology and Soils

The area surrounding the Swift Ag site is located on top of unconsolidated valley fill and valley train materials ranging in thickness from 50 to 120 feet (Schicht 1965). The valley fill material is composed of alluvial deposits (sands, gravels, and clays) that overlie the older valley train deposits (outwash sands and gravels from glacial meltwater), which range in thickness from 30 to 40 feet (Schicht 1965). The bedrock underlying the unconsolidated valley fill and valley train deposits consists of the Mississippian-age Lower Chesterian Series. Limestones, sandstones, and shales make up the series, which ranges in thickness from 100 to 300 feet (Student *et al.* 1981).

Area well logs indicate that local wells are screened primarily in sand and gravel units in the unconsolidated deposits at a relatively shallow depths. Other wells in the vicinity of the site, however, are sunk to depths ranging from 30 to 116.5 feet and are generally used for irrigation, industry, and drinking water (E & E 1990). Fill and valley train deposits are

hydraulically connected to the bedrock; therefore, the aquifer under investigation includes both the unconsolidated valley fill and valley train deposits as well as the Lower Chesterian bedrock series. According to area well logs, the depth to the unconsolidated deposits is approximately six feet. Depth to groundwater is approximately 30 feet, and the groundwater flow direction under the site is toward the west/southwest (E & E 1991).

4.1.2 Groundwater Releases

A release of hazardous substances from the Swift Ag site to groundwater is possible. However, no groundwater samples were collected at the site during the 1989 SSI to determine if site-related contaminants were present in groundwater downgradient of the site. The site is not known to have any on-site monitoring wells.

There are no engineered containment devices on site that would prevent the downward migration of contaminants to the groundwater. It is possible that Target Analyte List (TAL) and Target Compound List (TCL) chemicals could impact the groundwater that may exist beneath the site. Due to the high hydraulic conductivity of the underlying soil strata, it is possible that contamination could migrate down to deeper aquifers and affect the Illinois-American Water Service wells.

4.1.3 Targets

Approximately 1,797 persons are served by the Mound Public Water Supply (PWS), which draws its drinking water from one groundwater well located within the town of State Park, Illinois, a town located approximately 2.25 miles northeast of the site (USGS 1974; Carsellus 1995; Mound PWS 1995; 1995a). Since groundwater flows west/southwest, it is unlikely that the well that serves the State Park area would be impacted by on-site contaminants due to its location in reference to groundwater flow direction.

Outside of the Illinois-American Water Company water supply area and the Mound PWS service boundaries, there are approximately 734 persons who obtain drinking water from private wells within a 4-mile radius of the site and are therefore potential targets for groundwater contamination (E & E 1990a). The remaining population within a 4-mile radius of the site obtains drinking water from intakes located in the Mississippi River.

4.2 SURFACE WATER MIGRATION PATHWAY

A release to the intermittent surface water pathway, Rose Creek, has been documented, however, it is unlikely that a release to the closest perennial surface water body, Old Cahokia Creek, has occurred. Twelve soil/sediment samples were collected along various drainage ditches and on-site locations during the E & E FIT 1989 SSI. Contaminants of concern, including arsenic, benzo(a)pyrene, beryllium, chlordane and dieldrin were detected at concentrations greater than three times background levels (IEPA 1994). Rose Creek, an intermittent stream, is not likely to serve as a perennial source of contaminant loading to Old Cahokia Creek. It is unknown whether the site is prone to flooding, but is located within a 100-year floodplain of Old Cahokia Creek (IEPA 1989).

The Audubon Avenue Heron Colony, located at the intersection of 26th Street and Audubon Avenue, and the Fairmont City Site, located west of Fairmont City and south of Old Cahokia Creek, are two natural areas listed in the Illinois Natural Heritage Database. These potentially sensitive areas are within a 15 miles radius of the site. The Holten State Park, which contains Wispering Pond, is located in Centreville County, approximately 3 miles southeast of the site (United States Geological Service [USGS] 1974). Wispering Pond is a state-designated fishery (Illinois Department of Conservation [IDOC] 1991). None of these areas are likely to be impacted by site-related contaminants due to the lack of an overland surface water pathway from the Swift Ag site to these areas.

Approximately 300,000 persons within a 4-mile radius of the site obtain drinking water from the Illinois-American Water Company, which draws its water from two intakes on the Mississippi River located upstream from the site (Buck 1995).

Rose Lake, which appears to be an intermittent lake, is approximately 0.1 miles southwest of the site. It does not appear that Rose Creek flows into Rose Lake because Rose Lake is located south of the Penn Central Railroad tracks and Rose Creek runs east to west along the north side of tracks (USGS 1974). The ecological significance of Rose Lake is unknown.

Threatened and endangered species live within St. Clair County. The capacity with which animal species could be affected by on-site contaminants is unknown. Species that come in contact with the site may be exposed to on-site contaminants via dermal contact and incidental ingestion of soil and surface water (IEPA 1994). See Appendix C for a listing of threatened and endangered species in St. Clair County.

4.3 SOIL EXPOSURE PATHWAY

A release of hazardous substances from the Swift Ag site to on-site soil is documented. Soil and sediment sample collected during the 1989 SSI indicated the presence of heavy metals, pesticides, and PAHs at levels exceeding three time the background concentrations. There are no containment devices around the on-site tanks or loading dock that would prevent soil contamination in the event of an on-site spill/leak (E & E 1990).

According to the E & E TAT 1995 site reconnaissance, the Swift Ag site is currently fenced and inaccessible to the public. The site is located in a densely populated area, however, and there is evidence of past trespassing on site (E & E 1995a). Two schools are located approximately 1 mile (straight-line-distance) southeast and southwest of the site. The nearest residences are located approximately 900 feet (straight-line-distance) southeast of the site. A nursing home is located approximately 2,600 feet (straight-line-distance) southwest of the site (IEPA 1980). The chemicals used and wastes generated at the site could present a potential threat to workers and trespassers. The railroad tracks that compose the south border of the site may or may not provide an adequate barrier between the residential areas and the site. There are approximately 8,934 persons within a 1-mile radius of the site (USGS 1974).

4.4 AIR MIGRATION PATHWAY

A release of hazardous substances to air is possible based on the site history involving spills of surface acid into Rose Creek in the 1970s. The site is currently active, however, there are no recorded complaints of air emissions problems in IEPA files. A wet scrubber is used to control particulate emissions generated from the blending process. There were no other documented air pollution control devices on site at the time of the E & E FIT 1989 SSI and the E & E TAT 1995 Site Reconnaissance. There are approximately 25 workers presently on site who potentially could be exposed to the chemicals present on site. It is not known if filters or respirators are used when the fertilizers are mixed and packaged. Sensitive environments located within a 4-mile radius of the site are not likely to be impacted by on-site airborne contaminants (E & E 1989; 1995, 1995a).

5. SUMMARY

The Swift Ag site, currently owned by Vigoro Industries, has been an active fertilizer/chemical facility since 1931. Analytical data from the 1989 SSI documents the presence of contamination in on- and off-site soils and sediments. Drainage ditches that flow off site contained contaminants that could migrate to Rose Creek. Rose Creek, an intermittent surface water body, flows west towards Rose Lake, the closest potentially sensitive environment to the site, however, it does not appear that these two surface water bodies are surfacially connected due to the presence of the Penn Central railroad line which run between them.

A release to groundwater is possible; however, the population that utilizes private wells within a 4-mile radius of the site is small, and public groundwater is primarily obtained from the Illinois-American Water Company or from the Mound PWS. Approximately 300,000 persons within a 4-mile radius of the site obtain drinking water from the Illinois American Water Company which obtains surface water from 2 intakes on the Mississippi River, upstream of the site. The Mound PWS obtains water from a well located in State Park, Illinois, approximately 2.25 miles northeast of the site. It is unknown where the private wells in the area are located.

A release of hazardous substances to the closest perennial surface water body, Old Cahokia Creek, is unlikely. The Swift Ag site is currently active, and there is a potential that contaminants could migrate off site via surface water pathways. Drainage ditches located on the north, west, and south sides of the site drain into Rose Creek, an intermittent stream which flows west approximately 2.2 miles to Old Cahokia Creek (USGS 1974). Due to the

intermittent nature of Rose Creek, it is unlikely that contaminants migrate to Old Cahokia Creek. The site is within the 100-year floodplain of Old Cahokia Creek.

The Audubon Avenue Heron Colony, the Fairmont City Site, and Rose Lake are 3 natural areas within a 4-mile radius of the Swift Ag site. However, land barriers such as roads and residential areas probably prevent on-site contamination from migrating into these areas. Therefore, these terrestrial areas are not likely to be affected by on-site contamination. Horseshoe Lake, located approximately 2.5 miles (straight line distance) northwest of the site, would not be affected by on-site contamination since it is unlikely that contaminants could migrate to Old Cahokia Creek which flows into Horseshoe Lake. Horseshoe Lake is a state-recognized fishery (IDOC 1991). Holten State Park, located in Centreville County, is approximately 3 miles (straight line distance) southeast of the site (United States Geological Service [USGS] 1974), would also not be affected by off-site contaminant migration. Wispering Pond, a lake within Holten State Park is a state-recognized fishery (IDOC 1991). Threatened and endangered bird species that live within St. Clair County could be exposed to on-site contaminants via dermal contact.

Humans that reside within 0.25 miles of the site may be impacted by on-site contaminants via dermal soil exposure and incidental soil ingestion. Trespasses could be exposed to on-site contaminants via dermal soil exposure and incidental soil ingestion. There are 20 to 25 workers on site who are at a risk to asbestos, pesticide, and fuel oils via inhalation, dermal contact, and incidental ingestion exposure.

A release of hazardous substance to air is possible, due to the fertilizer production operations at the facility and the chemicals stored on site. The mixing operations have a wet scrubber system to control fine particulate emission generated during the blend process. It is not known if site worker wear filters or respirators while working in this area of the facility. There is no documentation of any complaints or air releases from the site which have affected the wetlands or surrounding residential areas.

6. REFERENCES

References not included in Appendix D: documents that are currently available within U.S. EPA files; copyrighted documents that are currently available in E & E's library; maps produced by either the United States Geological Survey; and documents that are created by the various state agencies for public use.

- Britt, R., August 2, 1989, Plant Manager, Vigoro Industries, Fairmont City, Illinois, site representative interview, conducted by Regina Bayer of E & E FIT, Chicago, Illinois.
- Buck, Andy, August 10, 1995, Illinois State Water Survey, telephone conversation, contacted by Alix Rauschman of E & E TAT, Chicago, Illinois.
- Carsellus, R., August 15, 1995, Mounds Public Water System, telephone conversation, contacted by Alix Rauschman of E & E TAT, Chicago, Illinois.
- Child, W. February 3, 1972, MDSI, letter, to C.E. Clark, Chief, IEPA-DLPC, Re: IEPA inspection of Swift Ag site in July 1971.
- Ecology and Environment, Inc., July 27, 1995a, site reconnaissance visit of the Swift Ag Disposal Systems, Inc. site, performed by Sam Sirhan, E & E TAT, Cincinnati, Ohio.
- _____, April 13, 1995, site drive-by, performed by Chad Eich and Bob Meyers of E & E TAT, Chicago, Illinois.
- _____, May 2, 1990, Screening Site Inspection Report for Swift Ag Chem--Fairmont City Plant, AKA Estech Brand Fertilizer, U.S. EPA ID: ILD059995423, Chicago, Illinois.
- Illinois Department of Conservation, Division of Fisheries, August 23, 1995, telephone conversation, contacted by Alix Rauschman of E & E TAT, Chicago, Illinois.

- Illinois Environmental Protection Agency (IEPA), 1994, Natural Heritage Database, Springfield, Illinois.
- _____, July 11, 1989, Site Inspection Report, Swift Ag Chemical-Fairmont City Plant, U.S. EPA ID No.: ILD059995423, Springfield, Illinois.
- _____, April 24, 1980, Drawing No. 101 from memorandum to State file, Springfield, Illinois.
- Merz, E.W., August 21, 1973, Collinsville Unit, IEPA, Collinsville, Illinois, Memorandum, to Division of Water Pollution Control, Field Operations Section, IEPA, concerning green discharge in drainage ditch near the Swift Ag site.
- Merz, E.W., March 7, 1975, Memorandum to the Division of Water Pollution Control, Field Operation Section, Interview with Mr. Robert Britt, Plant Manager.
- Mounds Public Water Supply, August 10, 1995, employee, Collinsville, Illinois, telephone conversation, contacted by Alix Rauschman of E & E TAT, Chicago, Illinois.
- August 18, 1995a, employee, Collinsville, Illinois, telephone conversation, contacted by Alix Rauschman of E & E TAT, Chicago, Illinois.
- Schicht, R.J., 1965, Groundwater Development in East St. Louis Area, Illinois, Illinois State Water Survey, Urbana, Illinois.
- Student, J.D., R.Piskin, L.J. Whithers, and J. Dickman, September 1981, Aquifers of Illinois: Underground Sources of Drinking Water and Non-Drinking Water, IEPA, Division of Land/Noise Pollution Control, Springfield, Illinois.
- United States Bureau of the Census, 1992, 1990 Census of Population Characteristics of the Population, General Population Characteristics, Illinois, Washington, D.C.
- United States Department of the Interior, 1984, National Wetlands Inventory Map, Monks Mound, Illinois Quadrangle, Washington, D.C.
- United States Geological Survey, 1954, 7.5 Minute Series Topographic Maps, Monks Mound, Illinois Quadrangle, photo revised 1974, Reston, Virginia.

APPENDIX A

1995 SITE RECONNAISSANCE PHOTOGRAPHS

1

Direction: Southwest

Time: 12:03

Date: April 13, 1995

Description:

Showing property which adjoins Swift Ag on the north. Swift Ag in background.



Photo:

2

Direction: Southwest

Time: 12:03

Date: April 13, 1995

Description:

Showing main entrance with main building in background.



Direction: East

Time: 12:03

Date: April 13, 1995

Description:

Showing the chemical plant located across Kings Highway from Swift Ag.



Photo: 4

Direction: south/

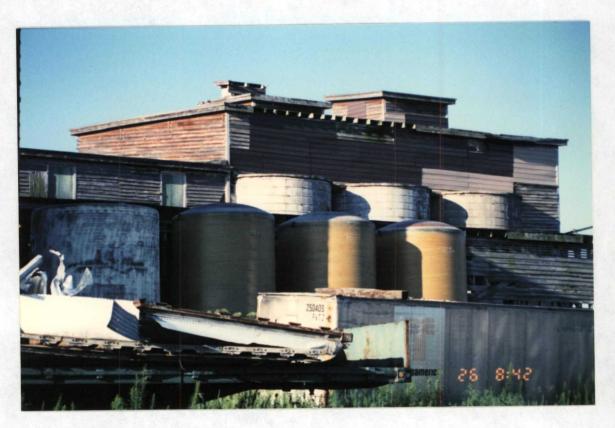
southwest

Time: 8:53

Date: July 27, 1995

Description:

Northwest corner of the main building. Showing silos 9, 10, and 11.



Direction: South

Time: 12:03

Date: April 13, 1995

Description:

Shows Swift Ag in background and adjoining property to the north in foreground.



Photo: 6

Direction: Northwest

Time: 12:03

Date: April 13, 1995

Description:

Showing the southern side of the Swift Ag property.



Direction: Southwest

Time: 8:43

Date: July 27, 1995

Description:

East side of main building.

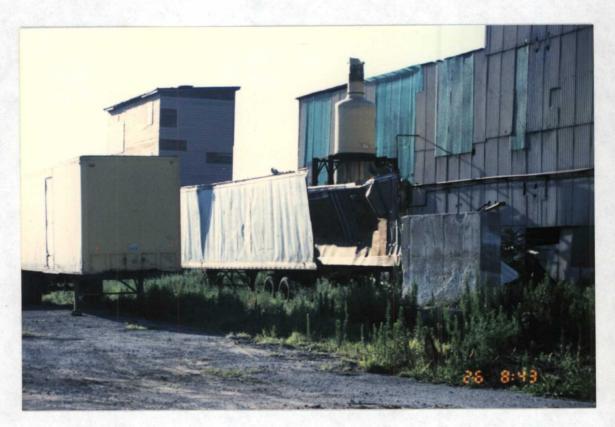


Photo: 8

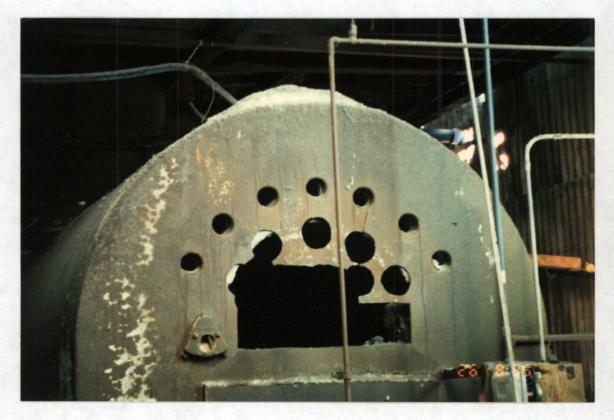
Direction: Southwest

Time: 8:35

Date: July 27, 1995

Description:

Empty concrete tank.



Direction: Southwest

Time: 8:35

Date: July 27, 1995

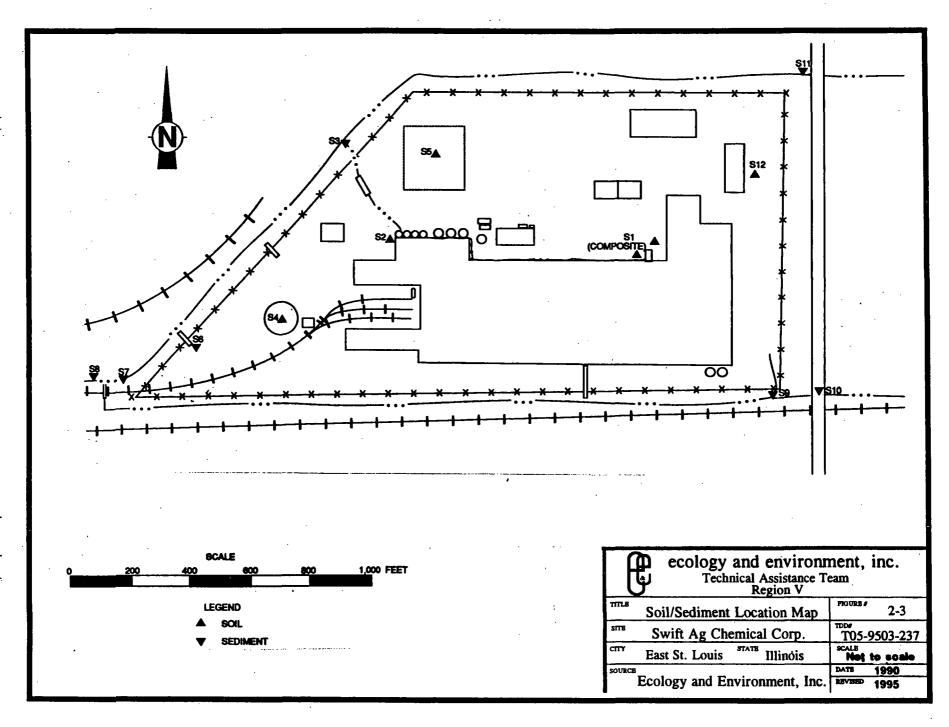
Description:

Empty concrete tank.



APPENDIX B

1990 SCREENING SITE INVESTIGATION SOIL SAMPLING LOCATIONS AND ANALYTICAL RESULTS



RESULTS OF CHEMICAL ANALYSIS OF FIT-COLLECTED SCIL/SEDIMENT SAMPLISH

												
Socia Coligation Information	•						Consta uter					
1 Parage 4:5	\$1	92	÷-	74	35	÷; .	Emple Juger	e:	:50	717	511	• **
	8/3:89	8/3, 69	e :7c:	8/3/87	8/2/25	3/2/25	8/0 80	5.3789	2/3/65	2/3/8:	8/3/75	373787
nie De	::09	1111	1177	8/3/8:	872 2V	1250	305	1515	1401			1477
1 Brownie fraific Seport No. Aer	EFA12	EFA13	EFA):	EF/15	574	EFA17	EF 419	EFALO	EFA20	1410 EFAC:	1430 EFA22	EF527
The Indispation is office Report Number	SEC 12	MZEF12	K\$3514	#ESS15	MEET ! !	HEEF!	KE:718	MEEE12	MEEFOC	MEEF2.	KEEF22	WEELCH
Coscurt Petroted									•			
values in wolled												
statile Organis												
ethylene chlorido	53	5	27	12	7.	?1	331			303	281	14
ege ⁿ ena			33		14	46	2422			2:03	130.	
-intanona (KEK)		-		· · · · <u></u>			. 23			21.7	:::	
enzene			43									
s trachloroethena				• ••				133				
ctuere	53	16.	, 35	14	210			?]		53		
trythenzene	•-		51	•						·	-	•-
xylenes (tolal)			22				•-					·
Semi-volatile Organics						•						
4-dichlorophenal										1,300		
aphthalene		833		·					1303	3603	1701	403
I-chloro-3-methylphenol					2003		••		_			
2-sethylnaphthalene		463			••	•	-	13,0003	2903	8703	1102	453
icenaphthylene		453		• ••	1033			•-				
acenaphthene					873			·	1703	2103	1003	
dibenzofuran							 ,		2301	2703	::01	
diethylphthalate		·									450J	
Dunrene			••			·		3,7003	240J	2703	1693	
hexachlorobencene		983		•-	2403			· 				•
phenanthrene	660	2503			1,100		67::	14,0003	3,600	4,300	1,300	513
anthracene	1093	• ,	••		750:			·	630	5203	2507	
from butylphthalate										1703		•*•
fluoranthene	2,350	2993		2,700	1,811	760J	2,000]		3,800	5,200	1,900	50.
, rece	3,9003	430	5053	3,5102	1.7503	2703	2,6000	••	3,400	4,0003	2,0003	553
Litylberoylphthalate	1600			••	••		• •	••	• • •		2303	•
terucialanthrocene	1,200	2323	••	5403	1,100	• • •	1.7700	••	1,777	1,300	750	••
thryseoe	2,0001	3663	5332	8303	57.5	1.70:1	2,6012	••	:,600	:,800	1.170	453
is(2)ethylhexyl)phthalate	6,1003	1,400	6003	5,000	2773		3,4000	••	4,300	1,600	2,500	• •
tenco[b]fluoranthene	2.6001	430J	2903	6 5 0J	1,215		5,300		1,800	1,700	1,200	66 J
berizolk3f1uoranthene	1,3073	310J	••	2501	8103	1,3003		• ••	1,200	1301	850	••
benzo[a]pyrene	1,700J	2703		3593	£212	6403	2,1003	••	1,200	6303	990	
indeno[1,2,3-rd]pyrena	1,4003 .	3203			5777	••	1,8003		840	43C.	750	
ditenso(a,h]anthracene	240.3			·					1903		1303	
benaolg,h,i3perylene		3201			4200		1,8003		80C	4403		

Sample Collection Information							Sapple, Saber,						
and Parabeters	\$1	32	11	54	ÇÇ	S6 .	57	\$8	58	610	511	512	
Senticides/Eds									· · · · · · · · · · · · · · · · · · ·		•		
Hertishlo:			4,8::::	•• .			\$1	•-			~-		
Dieldrin	390	250	200	• •	1400	4,7777	34007	27:	93	350	219		
₹. \$^-**₽Ð		••	-		••				47	1.50011		-	
1,41-007			• •			••			333	1,70017		• •	
alpha Chlordana							-				27:		
gawae Chiordake	2301	••	1,70003	. 	1603	3500	43913	1403	5.43	•	35.3		
Avolyte Detected (values in marks)						•					-		
aluziour.	10,400	7,600	7,550	26,100	10,100	20,760	13,970	19,700	12,200	26,000	6.36G	3,940	
satirony	13.4B									12.21			
ansenic	13.73NUP	6.23%B	4.4]K		32.539	13.3388	26.57%	24.6J+N	.E.53N	27.83%	5.53%	3.41	
er ins	123	£3.9	458	628	179	515	157	345	304	571	155	116	
eryllium	1.3	1.6	0.553	3.1	3	2.1	2.17	1.71	C.458	0.745	0.893	0.467	
cadaius	26.7	27.8	14	12.7	٤٦	75.2	344	330	5.7	6.4	14.1		
es) Chus	167.000	172,000	56,200	138,000	111,000	30,500	36,141	62,300	19,300	13,700	113,000	55,700	
chroeium	51.5	+8	33.3	307	ŧ3.ε	83	76.3	455	20.5	50.0	45.9	15.3	
cobalt	14	6.7B	3.28	27.63	11.58	9.15	6.58	118	3.38	4.1B	3.68	8.35	
copper	1,53034	6861Y	11234	84.83/	61834	45734	72931	446JA	144JA	3593A	187JA	18.934	
irea	21,800	18,500	14,500	38,400	24,500	45,600	26.953	33,100	14.900	21,300	17,100	17,400	
lead	523.JN	1.790Jr	526JN	281 JN	2.510J#	1.30CJN	1,65724	2,200JN	£3938	1.800JN	2,030JN	35.3JK	
bagnesium	8.690	6,690	1,740	46,500	6,800	2,340	3,25?	7,270	2,940	2,680	9,280	19,800	
manginese	3.980	2,650	463	1.B30	853	254	93:	735	192	1:8	754	785	
Bel CUI Y	0.43:1	0.638	5.3JN		6.43N	2.7JN	8.939	12JN	6.2JN	10JN	0.5JM	'	
nickel	59.4	32	22.2	79.7	35.3	8.29	21.99	26.€	8.92	3.01	13.5	15.7	
potassium	6,310	3,980	6,130	33,900	6,750	13,200	6,669	3,820	1,960	6,940	809B	7978	
selenium			0.3531978				3ZNB	1.BJMP	C.573NAB	0.9:317.7			
silver	31.53AK	7.2JANB	1.4JANB	3.4JANB	G.BJAN	6.CJAN	5 103AK	7.23AN	2.2JAMP	2.6JANB	3.934W		
sodi.a	-1		6839	1.3608			•			4,630			
thallium	1.2J+B				2.0J+B	_	2.4348	1.3348	0.70348				
variadium	59.2	56.2	38.3	124	43.5	119	85.4	77.2	26.5	61.4	45.9	21.5	•
#:r:	8,210	27,400	3.760	3,660	21,300	8,230	32,700	23,460	552	1,370	1,680	147	
cyanide		2.EJH		4.2JH	1.138	2.33N					.,	•••	

-- Bot catedresi.

200.00

CONFIDENCE DUALIFICAS	CEFINITION	INTERPRETATION
:	Indicates an estimated value.	Compound value may be semiquantitative.
5	This flag applies to pesticide results where the identifica- tion has been confirmed by 60/85. Single component pesticides officially in the first entract shall be confirmed by 60 hG.	Inspound was confirmed by SC/MS and in quantitation, the pesticide/ECE listed values.
ř.	This flag identifies all compounts identified in an analysis of a secondary iduation factor.	Alerts data user to a possible charge in the CROL. Data as quantitative.
AMALYTE QUALITIESS	DEFINITION	INTERPRETATION
ų.	Spike recoveries outside OD protectls, which indicates a possible matrix problem. Data ray be blased high or low. See spike results and laboratory natrative.	Value may be quantitative or sexi- quantitative.
,	Cuplicate value outside OC protocols which indicates a possible matrix problem.	Value may be quantitative or semi- quantitative.
•	Correlation coefficient for standard additions is less than 0.595. See review and laborator, natrative.	Pata value way to biased.
ı	Value is real, but is above instrument BL and below CRDL.	Value may be quantitative or semi- quantitative.
j	-Value is above CRDL and is an estimated value because of a OC protocol.	Value may be semiquantitative.
	Post-digestion spike for furnace AA analysis is out of control limits (35-115%), while sample absorbance is <50% of spike absorbance.	Value may be semiquantitative.

APPENDIX C

ENDANGERED SPECIES LIST FOR ST. CLAIR COUNTY, ILLINOIS

APPENDIX C

ENDANGERED SPECIES LIST FOR ST. CLAIR COUNTY, ILLINOIS

Latin Name	Species Name	Habitat	Status
Botaurus lentiginosus	American Bittern	freshwater marshes, wetlands	E
Casmerodius albus (Linnaeus)	Great Egret	Floodplain forests	Е
Egretta caerulea (Linnaeus)	Little Blue Heron	Wetland forests, marshes	Е
Egretta thula (Molina)	Snowy Egret	Lagoons and marshes of the American Bottoms	E
Gallinula chloropus (Linnaeus)	Common Moorhen	Freshwater marshes, lakes, ponds	T
Lanius ludovicianus Linnaeus	Loggerhead Shrike	Agricultural areas, grassland habitat	Т
Nycticorax nycticorax (Linnaeus)	Black-crowned Night Heron	Wetland thickets, bottomland forests	E
Podilymbus podiceps Linnaeus	Pied-billed Grebe	Well vegetated lakes, ponds, marshes	E

Key:

E: Endangered Species T: Threatened Species

APPENDIX D

REFERENCE DOCUMENTATION

ecology and environment, inc	TELEPHO	NE LOG	Metro Tho Report			
confact. Such	company of agen SU. St. Wa	tu Suu	ey Deologio			
CONTACT ADDRESS Springfield Oll.		CO	NTATI PHONE NUMBER			
Clix Rauschnan	Ougust!	0,1995	MOCOOUT MILE			
PROJECT: NUMBER 0181494 SITETION MILES	w Depose	I Suptim	Fairment City			
East St. Louis	_					
the Illinois - America	a Water	Co. 5	he intakes			
where the water Co	obtains	its c	voter are			
from the Mississe						
OR YROSE UNTERS	v y	_				
Cind Taunship 4N		7				
Woodriver ha		_	which they			
affers drinking 1	water. W	ella c	3.4,6 are			
@ 549WS.c.2817	E. Wells	2 1,2,	5 are @			
5N9W Soc 28.8E	wordling	e is d	50WN			
municipality.						
Jannat (the also	affai	no dim king			
custes from the I	UO- am	in Wate	4 Co.			
Pup of W.R.	= 18040	and	in 1993			
they pumped 4083 m gallyn, yeurpage						
for geogle of woo	A River					
SIGNATURE PLEASURE CONTRACTOR OF THE PROPERTY	el	PAGE				

ecology and environment, inc	TELEPHONE	LOG	Mitw Room Turnao Apert
CONTACT.	IEPA Pab. WA	terDie	POSITION
Springfeld St.		SONTAC OM-	T PHONE NUMBER
-	august 10	995 TIM	4pm
PROJECT: NUMBER LO 18 I VAA SITET OF	word words	e senn	diment
E.St. Louis,	Belleville,	and F	
amer. Water Co.	i i	$\frac{130}{130}$	Long
Persono.	~ upp to	<u> </u>	
wood River	has a po	pob	10040
Mound Pu	1S = 0 wn 0	mmu	nity
			· · · · · · · · · · · · · · · · · · ·
·	·		
	· ·		
		-	
SIGNATURE A			
signature Wittean Lausex	2	PAGE	OF

ecology and environment	, inc.	TELEPHONE	LOG	Merence Mutw Report
CONTACT. Employee-Receptionist		Mounda Rub.	ester?	Sip. Position
Paul St. Collineir	lle.	IL 68934	6	TACT PHONE NUMBER
Clistranoel		August 10 199		
PROJECT: NUMBER ELOUELURA SI ZT3051 ELOHITURA	THE NAM	E and LOCATION Social	<u>د</u>	Jaimont lity Ollinois
DISCUSSION De Morene	es Pw	S serves p	art	& E. St. Caris
and the State Car			ille)	Thy
Curetly have 5	99 a	ecounts.		C1. 1.0 4.+
Lung util Enon where wells Pon Carsellus.	mere	e, and re	Leve	I me to
Ron Carsellus.			l	
	<u> </u>	 .		
•		·		
	· · · · · · · · · · · · · · · · · · ·	,	<u></u>	
		·	· · · · · ·	
		· · · · · · · · · · · · · · · · · · ·		
SIGNATURE CLUC CON COURS	2		PAGE	or

1	1	2	þ	
İ		Ų	Ş	

ecology and environment, inc. CHICAGO, ILLINOIS

TELEPHONE LOG

mounds Public water systems receptionist

CONTACT.	COMPANY OF AGENCY	POSITION
Ron Carsellus	Mounds Public Water	Systems manager
CONTACT ADDRESS		CONTACT PHONE NUMBER
1 Paul St. Collinsville, 1	1 (2234	618-344-9264
EAE EMPLOYEE	DATE	11ME 0130
Alix Plauschman	August 14, 1995	2:30pm
PROJECT: NUMBER Z=1305/ ELLOCK/UAP	MANE and LOCATION Thomas Surana The Weposal Systems	سدد مسا
Z73051 EILOUS (UAA) LT 3051 EILOUITVAA	no eleposal Systems	Fairmont City
DISCUSSION The Hounds &	PWS obtains are	A HELLA
Α		
for durking	unter use.	The well
in Oprata DC	near to the	all.
~	- an A Gamba (7 W
le anec is	called State G	rone.
· .		·
•		
	·	
		·
	•	
	e e	
		
SIGNATURE PLIXAROUSA	2	AGE OF



ZT305 /
Job Number <u>ETL0055VAA</u>

Swift Ag. Chem.

Drive by

* Photolog of Metro

Disposal (Assible site. 10)

FSIP

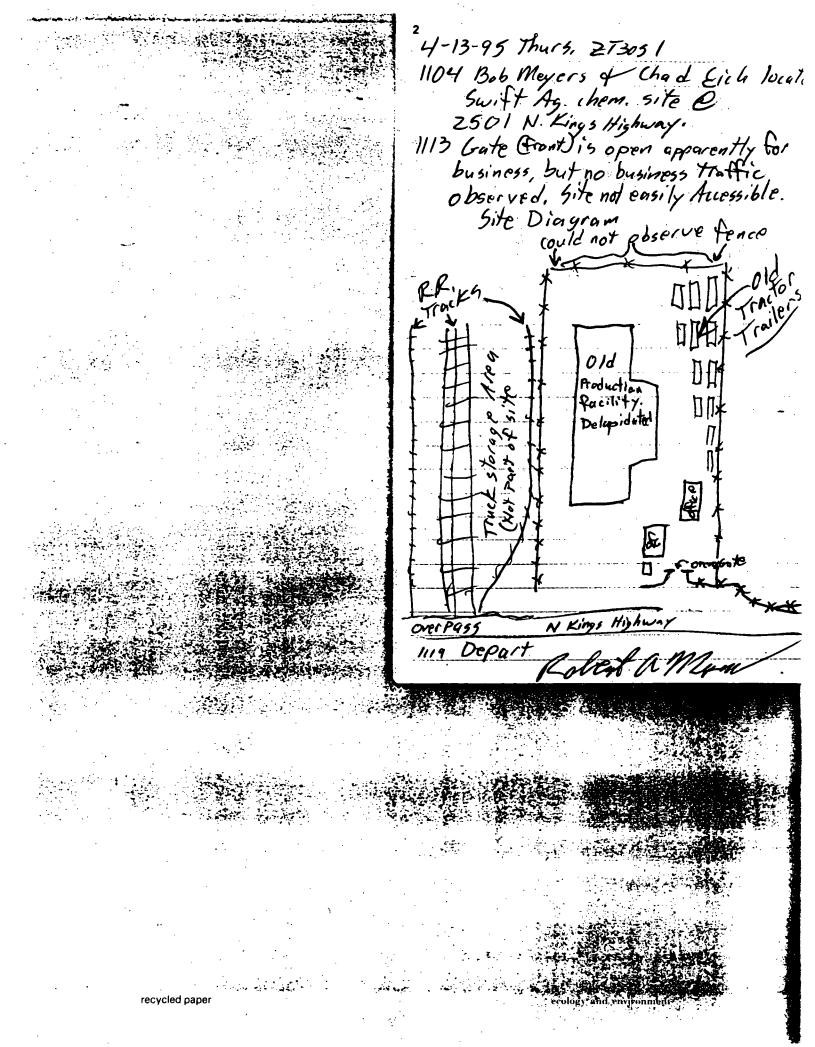
E & E Job Number	<u>273051</u>
Telephone Code Number	· · · · · · · · · · · · · · · · · · ·
Site Name	Swift Ag. Chem.
City/State	Fairmont Lity/IL
	05-9503-237 EILOOSSVAA
Start/Finish Date	4-13-95, 4-13-95
Book	of

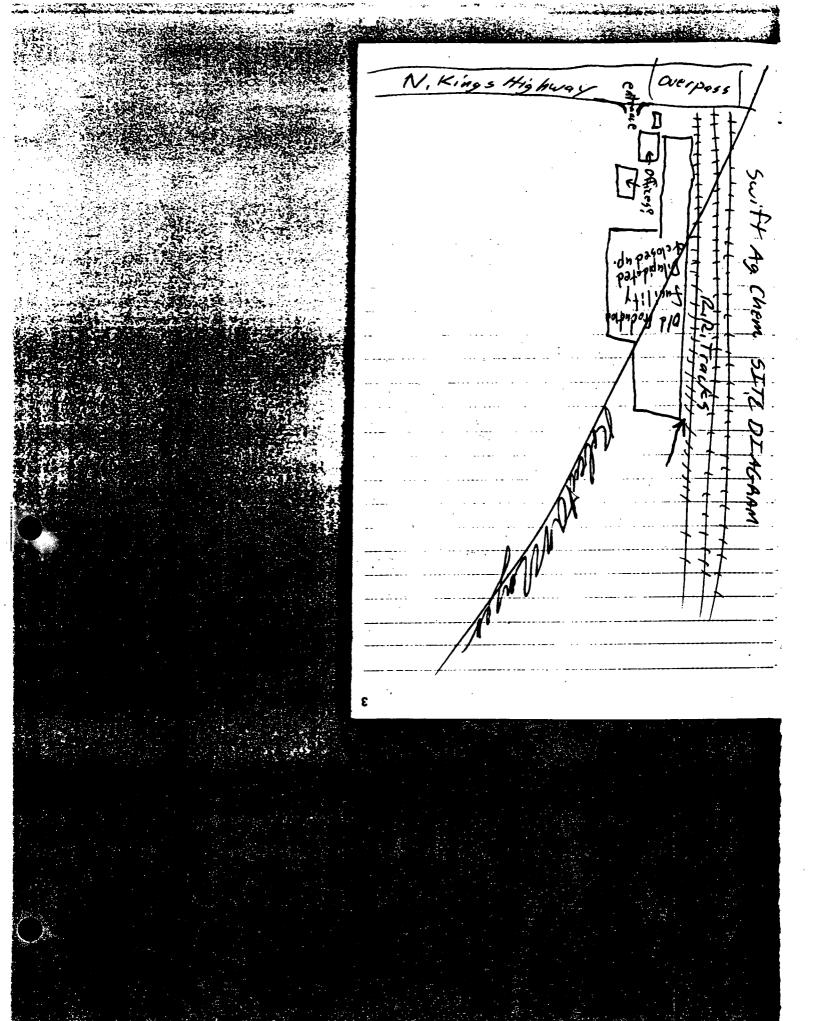
E & E Emergency Response Center: (716) 684-8940

E & E Corporate Center: (716) 684-8060

MEDTOX Hotline: (501) 370-8263

E & E Safety Director (Home): (716) 655-1260





Switch a Drive by,

1120 Observed a large chemical

plant immediately across the

strept from site General Chemical),

and a large Tractor Trailer

storage area behind the

51 te and to the NW Estilans work side along N. Kings Highway.
Geneneral Chem. appears activ

Metro Disposal 4-13-98 273051
145 Bob Meyers & Chad Eich took
Photos, Roll#2, Framos 1213,14415.
of the Supposed Metro disposal
Site, ID Not Confirmed.

Photos of Su and Surrounding	ift Ag. Chem.
203 Take photos 2 27+28 of facility	4 Surrounding 5.
	-

663 9415



ecology and environment, inc.

International Specialists in the Environment



Job Number 27305/



SITE NAME Multiple

TOD # Multiple

PAN # Multiple

SSID#

BOOK 1 OF 1

Swift Ag 7/27/95 Weather - Sunsy, Not with B. U. France 0716 Mike KENNA, and handed Mike Konna the U.S. STA INTRO w fortilger pood fully 7 the See by 1986

and a minimum

that is many the

T Bay

5.3.

Swiftly 7/27/95

At the main blending area,

Mr Bruse has 2-3 employees it the factor. Mone Apromima + Diamonium phosphate - Granghalism bulling, day on sofam - anderby the south of gothe - Don produggeen stronge was - semoved for fine mer shall office - Ma truezes from 2 1700 gellors - foul park with no Contament. the Central portion of the building stays inch et until evaporates. The site started operation in early 1940 Vigro. Inc., lead the property until it purchased it in 1986. Hagur operation was fortilizer blinding and packaging for relact The main blending building All Corraines Sold fortilizer (Contain, og Mono-ammoniam - Phosphoto can Di-amonium phosphoto) - Mr Kenna Good that port of The Consevent with In RE-SALE TO LOCAL FARMERS

Swift Ag Freeze somplayers are not 40. is no reed for that. Completed blending building inspection, AT BRINDING PLANT, This plant Contains grinder and a dryer My Georgia Contains loose askestos GRIND NG Bus lobing is not Secured was one askes tos Warning sign door step. 42 Kenna Goid they are in the ps up selecting a Contractor for as bestos b x 100,000 vallors Concrete trake Solis fertilizers, was 45,000 maller under your Blending plant the lank removed papers west of Ble ! At the Same location (2 50 Building Mr Freeze th 2 × 700 gallon tanks, strucysours, two stitches to the next a

ecology and environmen

	15
Swift Ag	
+ The Site is fineed and	
* The reasest- main water to	and Rose Lake is
~ 200 NE of the Dite (chown orade I but
no opposint of cit sun-	Il of wastre of
astainment water	
TAT alluted ~ 9 photos	(See Film +2
Frames # 17 - 21 5.5	
+ NO Date waitable since	last HRS
0930 Deported 5.to	
Samuel Star	SEE SITE SKETCH
- Camed	ON PAGE 17)
1/27/95	
	· · · · · · · · · · · · · · · · · · ·
. / .	
· *	
	Vigoro Industries, Inc.
	Michael Neal
	Director of Environmental Affairs
	6 Executive Drive • P.O. Box 1986
	Collinsville, IL 62234 Res: 618-632-4143 (618) 346-7448 Pager: 338-5522 (618) 346-7451 FAX Mobile: 973-9390

recycled paper

